

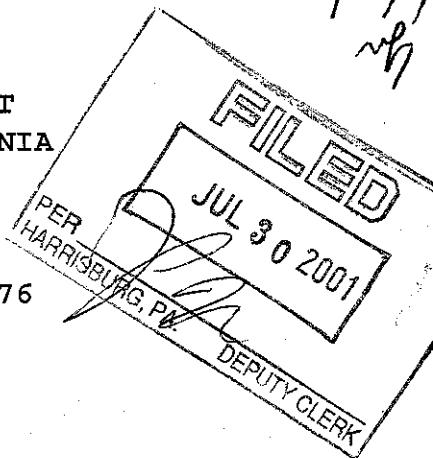
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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CARLOS BRUZON, :
Petitioner, : NO. 1:CV-01-1176
v. : (KANE, J.)
UNITED STATES IMMIGRATION AND :
NATURALIZATION SERVICE, :
Respondent. :



MOTION FOR ENLARGEMENT OF TIME

COMES NOW, the United States of America, by its attorneys, Martin C. Carlson, United States Attorney for the Middle District of Pennsylvania, and Joseph J. Terz, Assistant United States Attorney for the same district, and respectfully represents to the Court the following facts:

1. On June 27, 2001, the Petitioner filed a Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241.

2. On July 2, 2001, the Court issued an Order stating:

(1) Petitioner's motion to proceed in forma pauperis is granted.

(2) The Clerk of Court is directed to serve a copy of the petition on the Respondent and the United States Attorney.

(3) Within twenty (20) days of the date of this order, Respondents shall file a response to the petition.

(4) A determination whether Petitioner shall be produced for a hearing will be held in abeyance pending the filing of a response.

(5) Petitioner may file a reply to the response within fifteen (15) days of its filing.

3. The U.S. Attorney's Office received the Petitioner's petition for writ of habeas corpus on July 3, 2001.

4. On July 30, 2001, the Court granted Respondent's request for a five (5) day enlargement of time.

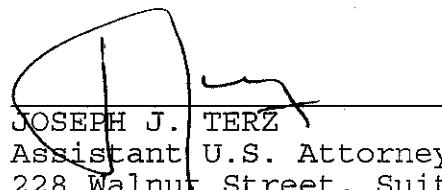
5. In light of the United States Supreme Court ruling in Zadvydas and St. Cyr, the United States respectfully requests an additional ten (10) days to file a response.

6. The undersigned did not seek Petitioner's concurrence because Carlos Bruzon is currently incarcerated and is proceeding pro se.

WHEREFORE, respondent requests that the Court grant a ten (10) day extension of time to respond to this Petition.

Respectfully submitted,

MARTIN C. CARLTON
United States Attorney


JOSEPH J. TERZ
Assistant U.S. Attorney
228 Walnut Street, Suite 220
P.O. Box 11754
Harrisburg, Pennsylvania 17108-1754
(717) 221-4482

Date: July 30, 2001

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:

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion to be competent to serve papers.

That this 30th day of July, 2001, she served a copy of the attached

MOTION FOR ENLARGEMENT OF TIME

by placing said copy in a postpaid envelope addressed to the person hereinafter named, at the place and address stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail at Harrisburg, Pennsylvania.

ADDRESSEE:

Carlos Bruzon Guillen, A22-801-576
PIKE COUNTY JAIL
H.C. 8, Box 8601
Hawley, Pennsylvania 18428


Naomi Zimmerman
Legal Secretary